



AIR QUALITY PERMITTING STATEMENT OF BAISIS

January 13, 2006

**Tier II Operating Permit
No. T2-050511**

RDO Processing, Dubois

Facility ID No. 033-00002

Prepared by:

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AIR QUALITY DIVISION**

FINAL PERMIT

Table of Contents

1.	PURPOSE	3
2.	FACILITY DESCRIPTION	3
3.	FACILITY / AREA CLASSIFICATION.....	3
4.	APPLICATION SCOPE	3
5.	PERMIT ANALYSIS.....	4
6.	PUBLIC COMMENT	4
7.	RECOMMENDATION.....	4

APPENDIX – AIRS INFORMATION

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.400 through 410 *Rules for the Control of Air Pollution in Idaho (Rules)* for issuing Tier II operating permits (Tier II).

2. FACILITY DESCRIPTION

RDO Processing, LLC (RDO) processes dehydrated potato products at the facility located near Dubois, Idaho. The process primarily involves potato dehydration to make potato flakes. Potatoes are cleaned, peeled, cooked and sized prior to being transferred into a drying unit. The main sources of emissions include a boiler, dryers, dehydration lines, pneumatic material transfer equipment and packaging lines. Some dryers are of the direct-fired type and some use steam from Boiler #1.

3. FACILITY / AREA CLASSIFICATION

RDO is a major facility for purposes of the Title V program as defined under IDAPA 58.01.01.008.10 because the actual or potential emissions of SO₂ and NO_x exceed 100 tons per year. RDO is not a major facility for purposes of the PSD/NSR program as defined under IDAPA 58.01.01.205.01 (40 CFR 52.21(b)(1)). The AIRS classification is "A."

The RDO facility is located within AQCR 61, UTM zone 12 and Clark County. The area is classified as attainment or unclassifiable for all federal and state criteria air pollutants. The SIC is 2034 which represents establishments primarily engaged in artificially dehydrating fruits and vegetables, including "potato flakes, granules, and other dehydrated potato products."

The AIRS information provided in the Appendix provides the classification information for each regulated air pollutant at RDO. This required information is entered into the EPA AIRS database.

4. APPLICATION SCOPE

On December 20, 2005 DEQ received a request from Blaine Larson Farms to transfer their March 7, 2005 Tier II/PTC (# P-040534), to RDO the new owner of the facility.

There are no new emissions units or modifications to existing emissions units.

4.1 Application Chronology

December 20, 2005	DEQ received a request to transfer the Blaine Larsen air permit to RDO Processing Blaine Larsen and RDO also requested transferring an October 17, 2005 Tier TII application and an October 15, 2003 Tier I application from Blaine Larsen Farms to RDO Processing, LLC
January 10, 2006	DEQ received a letter from Blaine Larsen describing contractual agreements with RDO regarding legal control of property boundaries and requested Blaine Larsen consent orders be transferred to RDO.

5. PERMIT ANALYSIS

This permit action is simply to change the name of the owner of the air pollution emitting activities from Blaine Larsen Farms to RDO Processing. It does not affect in any way the equipment which was permitted under the Blaine Larsen's March 7, 2005 Tier II/PTC (# P-040534) nor does it change the emissions inventory or regulatory requirements. This permit is effective immediately and replaces Tier II/PTC No. P-040524, issued to Blaine Larsen Farms on March 7, 2005. The only changes to this permit are:

- name of the permittee
- permit number
- issuance date and General Provisions 5 and 7 have been deleted.
- removing one time source tests
- changing the particulate matter schedule for the wabash boiler
- requiring maintaining generation and maintenance manuals instead of requiring their development within 60 days of permit issuance.

5.1 *Ambient Air*

RDO has proposed to use its property boundary along with the boundary of adjacent property owned by Blaine Larsen Farms as the ambient air boundary. To accomplish this, RDO must obtain legal, exclusive control of the adjacent property, including access control over employees at Blaine Larsen Farms. Blaine Larsen Farms will contract with RDO to custom farm the land around the plant. RDO will assure the restrictions of public access using any of the methods described in the State of Idaho Air Quality Modeling Guideline (12/31/02).

5.2 *Fee Review*

In accordance with IDAPA 58.01.01.407 there is not a Tier II operating permit processing fee for changes in ownership of facilities.

6. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.404.04.c, a public comment period on the proposed Tier II operating permit and application materials is not required for revised permits.

7. RECOMMENDATION

Based on review of application materials, and all applicable state and federal rules and regulations, staff recommend that RDO Processing be issued a final Tier II Operating Permit No. T2-050511.

DP/sd T2 No. 0500511 and Case No E-060001

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APPENDIX
AIRS Information

AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

Facility Name: RDO Processing

Facility Location: Dubois

AIRS Number: 033-00002

AIR PROGRAM POLLUTANT	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	SM80	TITLE V	AREA CLASSIFICATION A-Attainment U-Unclassified N- Nonattainment
SO ₂	A		A					U
NO _x	A		A				U	
CO							U	
PM ₁₀							U	
PT (Particulate)								
VOC							U	
THAP (Total HAPs)								
			APPLICABLE SUBPART					
			Db	NONE	NONE			

^a Aerometric Information Retrieval System (AIRS) Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For HAPs only, class "A" is applied to each pollutant which is at or above the 10 T/yr threshold, or each pollutant that is below the 10 T/yr threshold, but contributes to a plant total in excess of 25 T/yr of all HAPs.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).